CBI

TALC

Mr Roger N. Miller
President
Windsor Minerals, Inc. ⇒ Cyprus Minerals Windsor
P.O. Box 680
Windsor, VT 05089

(802) 484-7761 -7763 main office

* 484-3052 ex-Sec Brammer (C-12-10)

114 Response 7/30/87

Conf. Portions ⇒ CBI

Acknowledgement sent 10/1/87

4/27/89 called & talked w/ Jim Brammer 802-484-7763

Robert Goff
Mgr of Operations
229-4807

* 1 - none by analysis

15 MAY 1989

Mr. Jim Brammer
Environmental Engineer
Windsor Minerals, Inc.
Post Office Box 680
Windsor, Vermont 05089

Dear Mr. Brammer:

The United States Environmental Protection Agency (EPA) is gathering information on air emissions of asbestos and other mineral fibers from the processing of several mineral substances including talc. Your company has been selected, along with several others that process talc, to provide information that will be used in considering the need for national emission standards for hazardous air pollutants for sources of contaminant asbestos under Section 112 of the Clean Air Act, as amended in 1977. We need information on process operations, design and operating parameters of air pollution control equipment, composition and fibrous content of raw materials and intermediate materials processed, and fiber characteristics of the mineral dust collected by air pollution control devices and emitted from these devices.

This letter was originally sent to Mr. Roger Miller in June 1987, however, since then more information is needed. The information needed is contained in Enclosure 1. Since the original information was given for 1986, it would be helpful if you could provide data corresponding to your 1986 production rate and processes. If this information is unavailable, you may include recent information with process and flow diagram changes, if any. We are sensitive to the amount of labor required to respond to this request, and we have tried to limit it to the data we need for considering whether regulations should be developed and to minimize demands on your time. We are not asking you to perform any new measurements and are requesting your best estimates where measurements are not available. Please respond "not applicable" to questions that do not apply to your operations.

The authority for EPA's information gathering is included in Section 114 of the Clean Air Act (42 U.S.C. 7414). Enclosure 2 contains a summary of this authority. If you believe that

disclosure of the information we request would reveal a trade secret, you should clearly identify such information as discussed in the enclosure. Any information subsequently determined to constitute a trade secret will be protected under 18 U.S.C. 1905. If no claim of confidentiality accompanies the information when it is received by EPA, it may be made available to the public by EPA without further notice (40 CFR Part 2.203, September 1, 1976). All emission data, however, will be available to the public. It will expedite the study and simplify matters if you would separate any information claimed to be confidential from the balance of the information provided.

Currently, there are no contractors assisting EPA in this project. However, any data generated may be furnished, after prior notification to your company, to EPA contractors or others in accordance with the provisions of Enclosure 3, which summarizes Agency and Emission Standards Division policies and procedures for handling privileged information. Enclosure 3 also describes EPA contractor commitments and procedures for the use of confidential materials. It is EPA's policy that compliance by an authorized representative with the requirements detailed in Enclosure 3 provides sufficient protection for the rights of submitters of privileged information.

If you have any questions regarding this request, need assistance, or are unable to provide me with responses to the enclosed questions by June 1, 1989, please contact me at (919) 541-5428.

Sincerely,

/S/

Beth Oliver
Industrial Studies Branch
Emission Standards Division

3 Enclosures

OAQPS:ESD:ISB:BOLIVER:mhinson:NCM:762:541-5428:MD-13:FILE:_____
DISC:OLIVER:5/11/89

Not subject to the requirements
of Section 3507, Paperwork
Reduction Act of 1980.

ENCLOSURE 1

INFORMATION REQUESTED

Please provide separate reports for each plant owned and operated by your company that mines or processes talc. If you have any questions regarding this questionnaire, please contact Beth Oliver of EPA at (919) 541-5428.

A. Talc Mining and Production - General Plant Information

1. Plant name _____

   Address _____

2. Plant coordinates - latitude _____ ° _____ min _____ s

   longitude _____ ° _____ min _____ s

3. Typical hours of operation

   _____ hours/day _____ days/week _____ weeks/year

4. Description of raw materials mined and processed for producing

   _____

   _____

   _____

5. Raw material throughput in short tons for 1986:

   _____

   _____

6. Brief description of the end-products produced and production in tons of each achieved in 1986 (attach separate sheets as needed).

   1986 tons/year _____

   _____

   _____

7. Descriptions and amounts (short tons) of any waste materials generated in 1986.

_____

_____

_____

B. Talc Production - Air Pollution Control Devices

For each air pollution control device applied, please provide the following information:

1. General	1	2	3	4
a. Type				
b. Emission sources served				
c. Gas flow rate (lb/hr)				
d. Particulate flow rate (lb/hr)				
e. Percent moisture in gas flow				
2. Stack Parameters				
Height (ft)				
Diameter (in)				
Discharge velocity (fpm)				
Gas temp (°F)				

B. Talc Production - Air Pollution Control Devices

For each air pollution control device applied, please provide the following information:

1. General	5	6	7	8
a. Type				
b. Emission sources served				
c. Gas flow rate (lb/hr)				
d. Particulate flow rate (lb/hr)				
e. Percent moisture in gas flow				
2. Stack Parameters				
Height (ft)				
Diameter (in)				
Discharge velocity (fpm)				
Gas temp (°F)				

B. Talc Production - Air Pollution Control Devices

For each air pollution control device applied, please provide the following information:

1. General	13	14	15	16
a. Type				
b Emission sources served				
c. Gas flow rate (lb/hr)				
d. Particulate flow rate (lb/hr)				
e. Percent moisture in gas flow				
2. Stack Parameters				
Height (ft)				
Diameter (in)				
Discharge velocity (fpm)				
Gas temp (°F)				

B. Talc Production - Air Pollution Control Devices

For each air pollution control device applied, please provide the following information:

	9	10	11	12
1. General				
a. Type				
b. Emission source served				
c. Gas flow rate (lb/hr)				
d. Particulate flow rate (lb/hr)				
e. Percent moisture in gas flow				
2. Stack Parameters				
Height (ft)				
Diameter (in)				
Discharge velocity (fpm)				
Gas temp (°F)				

N/L-8/24/87
87-05-
009-01

WINDSOR MINERALS INC. P.O. Box 680 Windsor, Vermont 05089
Telephone (802) 484-7761

Not shown on addressee list. MJC

August 10, 1987

Mr. Jack R. Farmer, Director,
Emission Standards and
Engineering Division
U.S. Environmental Protection Agency
Office of Air Quality
Planning and Standards
Research Triangle Park, NC 27711

Dear Mr. Farmer:

We enclose herewith our response to your request for information dated June 15, 1987.

We have segregated our response into two packets: one marked on each page TRADE SECRET -- we require that all of the information provided under TRADE SECRET be handled by the United States Government as confidential.

Placed in CBI file MJC

The unique arrangements of equipment, combinations of unit operations and volumes of ore usage and production tonnages would in the hands of the public, or our competitors, place us at significant economic disadvantage.

We believe our response to be complete and regret our inability to meet the July 27, 1987, filing date which you had requested.

Please note our notice of late compliance dated July 28, 1987.

Yours very truly,

WINDSOR MINERALS, INC.

Roger N Miller

Roger N. Miller, President

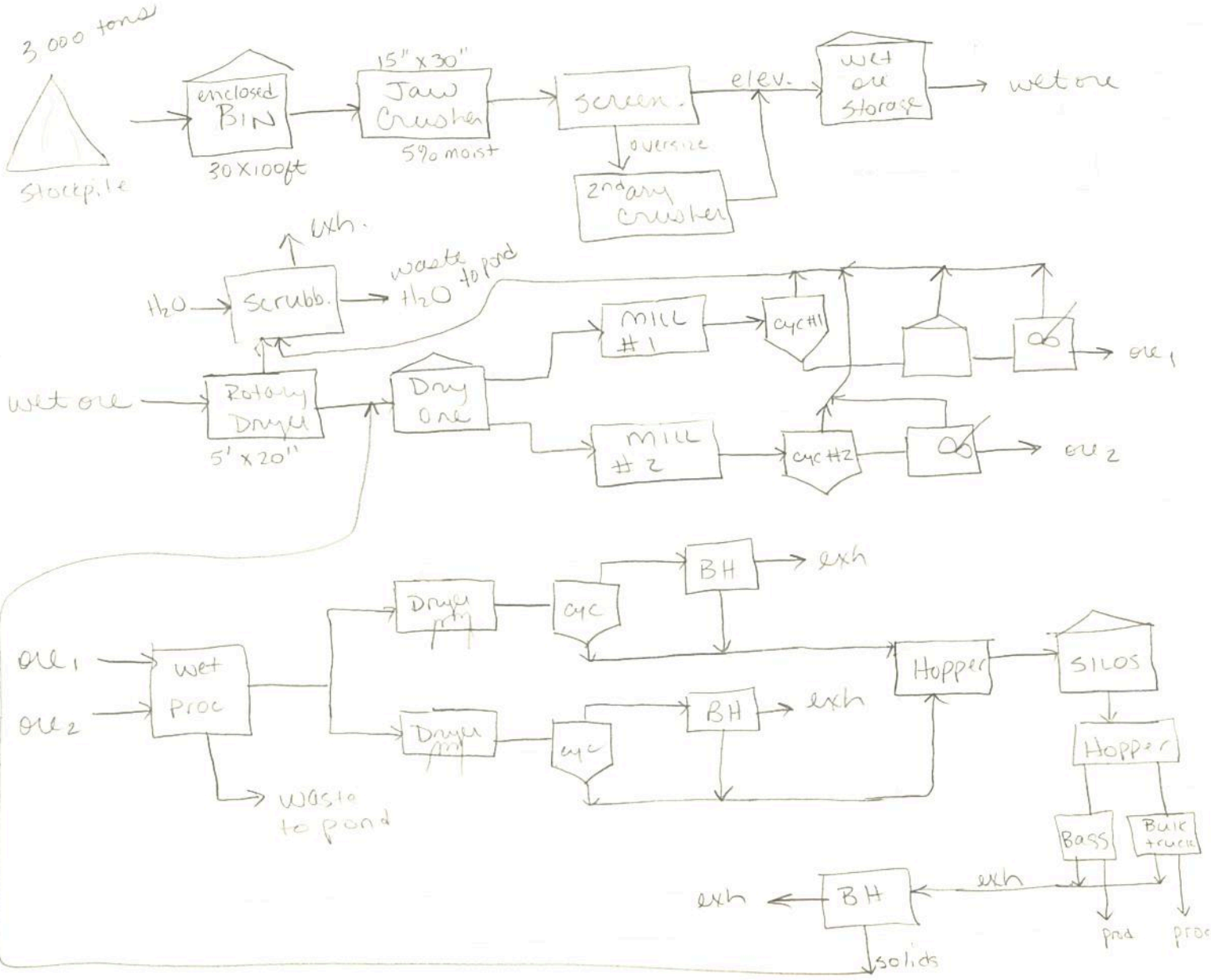
RNM/rb
Enclosures
cc: Mr. Willaim Egan, J&J Baby Products Company
Mr. John O'Shaughnessy, J&J Legal Counsel
Mr. Richard Sargent, Windsor Minerals Legal Counsel
Mr. Robert Goff, Windsor Minerals Manager of Operations
Honorable Robert Stafford, U.S. Senate

Windsor Minerals

Raw Matl - talc from company operated mines near proc. plants
- no cont. asb.

Plant W

West Windsor Mill - West Windsor, VT



Baghouses :

	Flash Dryer #1	Dryer #2	Bags
	19500 ft^3/min	6000 ft^3/min	6400 ft^3/min
	190°F	212°F	80°F
	< .02 gr/dscf partic	< .02	< .02
dust/sludge 1986	100 tons/1986	100 tons/1986	20 tons/1986

Scrubber

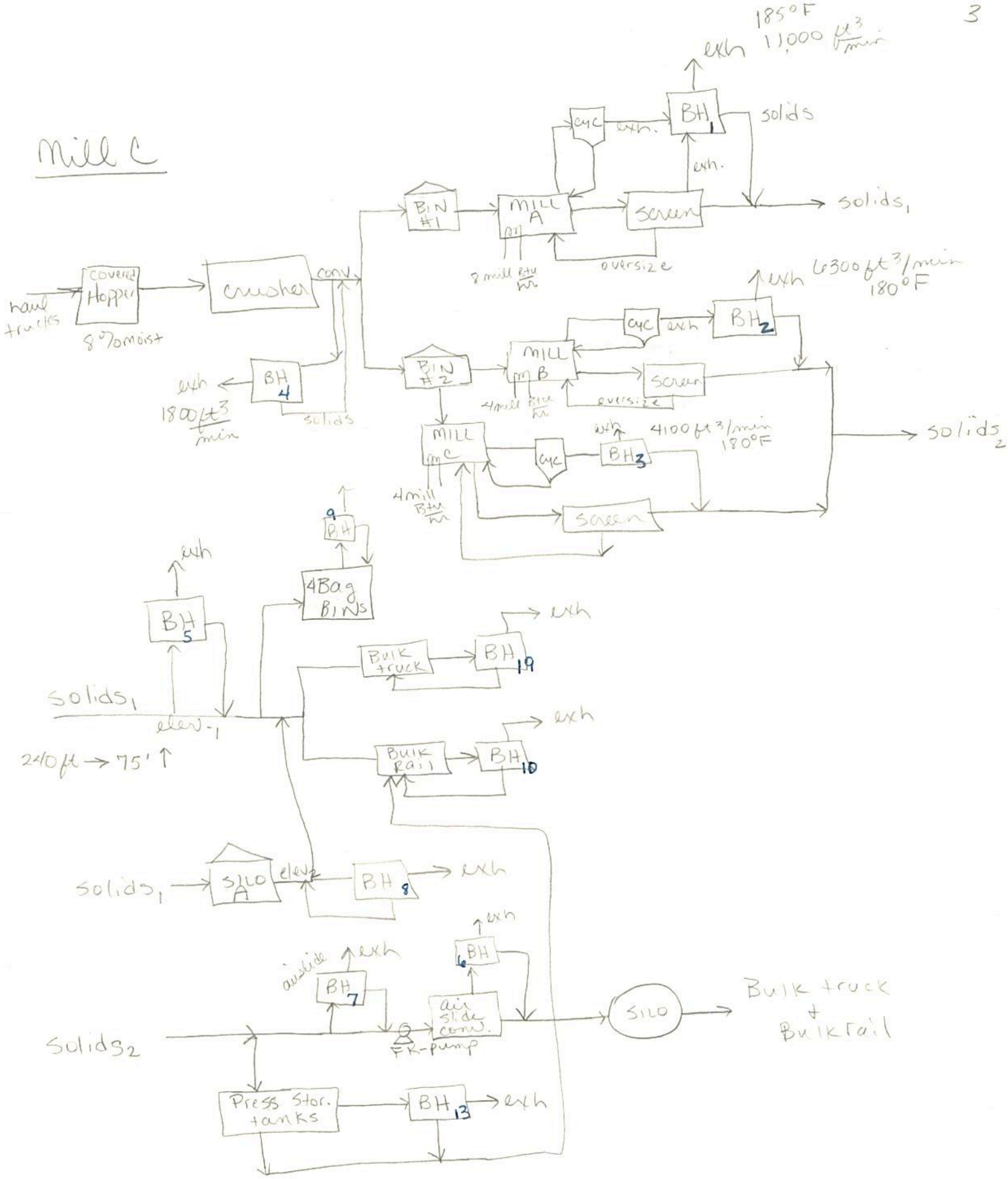
11400 ft^3/min
100°F
.04 gr/dscf partic
800 tons dust/sludge 1986

H_2O	68 gpm	parameters
L/g	.7 lb/lb	
press drop "H_2O =	3.5	

Baghouse Parameters

Height	41'
Diameter	34"
Disc vel	1800 ft/min
Gas temp	105°F

Mill C


185°F
11,000 ft³/min
exh
BH 1
cyc
exh.
solids
exh.
BIN #1
MILL A
screen
solids₁
8 mill Btu/hr
oversize
6300 ft³/min
180°F
exh
BH 2
cyc
exh
covered Hopper
haul trucks
8% moist
crusher
conv
BH 4
exh
1800 ft³/min
solids
BIN #2
MILL B
screen
4 mill Btu/hr
oversize
exh
4100 ft³/min
180°F
solids₂
MILL C
cyc
BH 3
4 mill Btu/hr
screen
9
BH
exh
4 Bag Bins
BH 5
exh
Bulk truck
BH 19
exh
solids₁
elev-1
240 ft → 75' ↑
Bulk Rail
BH 10
exh
solids₁
SILO A
elev-2
BH 8
exh
exh
outside
exh
BH 6
BH 7
air slide conv.
FK-pump
SILO
Bulk truck + Bulk Rail
Solids₂
Press Stor. tanks
BH 13
exh

Baghouses

1 Grinding Mill #1
11,200 ft³/min
185°F
<.02 gr/dscf part.
dust/sludge 1986
2500 tons
7.3 ft/min

2 Mill #2
6300 ft³/min
180°F
<.02
800 tons
4.1 ft/min

3 Mill #3
4100 ft³/min
180°F
<.02
600 tons
3.9 ft/min

4 Crusher
1800 ft³/min
293K
<.02 gr/dscf
2 tons
7 ft/min

5 Elevator 1
1800
333K
<.02
50 tons
7

6 F-K Pump
1800
323K
<.02
5 tons
7

7 airslide
1800 ft³/min
323K
<.02 gr/dscf
5 tons
7.03 ft/min

8 Elev. 2
1200
323K
<.02
1 ton
2.6

9 Bass stations
12,750
323K
<.02
200 tons
2.2

10 Bulkload (rail)
2000 ft^3/min
333K
< .02 gr/dscf
< 1 ton
1.1 ft/min

(1 Press)
13 Bulk Tank
1200 ft^3/min
333K
< .02
< 1 ton
2.6 ft/min

19 Bulkload (+truck)
2000 ft^3/min
333K
< .02
< 1 ton
1.1 ft/min

Bin Vent - 5
800 ft^3/min
303K
< .02 gr/dscf
6.25 ft/s

Bin Vent - 6
800
323K
< .02
1.8 ft/s

Bin Vent 7
800
323K
< .02
1.8 ft/s

Bin Vent 8
800
323K
< .02
1.65 ft/s